# United States District Court for the Eastern District of Pennsylvania-CIVIL

# REMOVED FROM COMMON PLEAS COURT of PHILADELPHIA COUNTY

CITY of PHILADELPHIA Petitioner

V.

**AISHA ASHA BRADLEY** 

(1) Summit Park East, GP,

Crossclaim-Respondent and or Defendant

(2) University City Housing Co,

Crossclaim-Respondent and or Defendant

Oct. Term, 2023 Docket No: 2310T0202

Property 800 SEFFERT STREET, UNIT A OPA # 214088515 No. T0202

### NOTICE OF REMOVAL

### JURY DEMANDED

(3) JUDGE PATRICK F. DUGAN-State Employee

Crossclaim-Respondent and or Defendant

(4) JUDGE MICHELE D. HANGLEY-State Employee

Crossclaim-Respondent and or Defendant

(5) JUDGE CRYSTAL BRYANT-POWELL-State Employee

Crossclaim-Respondent and or Defendant

(6) ADA JAMES DELLAFIORA-City of Philadelphia
Employee

Crossclaim-Respondent and or Defendant

(7) ATTORNEY TRACY TRIPP-Former City of Philadelphia Employee

Crossclaim-Respondent and or Defendant

(8) ATTORNEY AMY KIRBY-Former City of Philadelphia
Employee

Crossclaim-Respondent and or Defendant

- (9) THOMAS MARRO-City of Philadelphia Employee
  Crossclaim-Respondent and or Defendant
- (10) **DARIN GATTI-Former City of Philadelphia Employee**Crossclaim-Respondent and or Defendant
- (11) ATTORNEY PHOENICIA WALLACE-State Employee

Crossclaim-Respondent and or Defendant

(12) ATTORNEY IRENE BIZOSSO-Former State Employee

Crossclaim-Respondent and or Defendant

### (13) MICHAEL AMMANN-State Employee

Crossclaim-Respondent and or Defendant

(14) SUPERIOR COURT PER CURIAM-JANE/JOHN DOES for the JULY 11, 2022, ORDER at cases 1166 EDA 2022 and 1167 EDA 2022-State Employees

Crossclaim-Respondent and or Defendant

### (15) COMMONWEALTH COURT OF PA PER CURIAM

JANE/JOHN DOES for the JAN. 10-23, ORDER at cases 1192 CD 2022, 1193 CD 2022, 1194 CD 2022-**State Employees**Crossclaim-Respondent and or Defendant

- (16) PA SUPREME COURT PER CURIAM JANE/JOHN DOES for the June 26-23, ORDER at case 12 EM 2023-State Employees

  Crossclaim-Respondent and or Defendant
- (17) PA SUPREME COURT PER CURIAM JANE/JOHN DOES for the Aug. 11-23, ORDER at case 43 EM 2023-State Employees

  Crossclaim-Respondent and or Defendant
- (18) JUDGE MEGAN SULLIVAN (J-S03006-23/393 EDA 2022)State Employee

Crossclaim-Respondent and or Defendant

(19) JUDGE MARY JANE BOWES (J-S03006-23 /393 EDA 2022) -

### **State Employee**

Crossclaim-Respondent and or Defendant

(20) JUDGE DANIEL D. MCCAFFERY(J-S03006-23/393 EDA 2022)-

### **State Employee**

Crossclaim-Respondent and or Defendant

(21) JUDGE DANIEL ANDERS-State Employee

Crossclaim-Respondent and or Defendant

(22) JUDGE JOSHUA ROBERTS-State Employee

Crossclaim-Respondent and or Defendant

- (23) Feige Grundman-City of Philadelphia Employee Crossclaim-Respondent and or Defendant
- (24) Jill Freeman-City of Philadelphia Employee Crossclaim-Respondent and or Defendant
- (25) Alexandra Desantis-City of Philadelphia Employee Crossclaim-Respondent and or Defendant
- (26) Rebecca Rhynhart-Former City of Philadelphia

**Employee** Crossclaim-Respondent and or Defendant

### (27) PROTHONOTARY JOSEPH SELETYN-State Employee

Crossclaim-Respondent and or Defendant

### (28) THE COMMONWEALTH OF PENNSYLVANIA

Crossclaim-Respondent and or Defendant

#### **NOTICE OF REMOVAL**

# to the United States District Court for the Eastern District of Pennsylvania

**TO THE OFFICE OF THE PROTHONOTARY:** Kindly enter Respondent's NOTICE of REMOVAL due to Lack of Jurisdiction, Violation of Federal Laws, and Conflict of Interest for case 2310T0202 at the Common Pleas Court of Philadelphia.

January 18, 2024

Aisha Bradley 6225 Ellsworth Street

Phila., PA 19143

(610)659-7858/ BRDL3690@GMAIL.COM

#### **Appendices**

- COVER SHEET-COMPLETED
- DESIGNATION FORM-COMPLETED
- LIST OF DEFENDANTS AS OF JAN 18-24
- MOTION FOR ECF
- MOTION TO BE EXCUSED FROM PRODUCING ORIGINAL DOCS
- A ORDER IFP APPROVED AUG 29-23 T0155
- ORDER IFP APPROVED AUG 29-23 T0156
- STATEMENT CONTINUING IFP STATUS 02
- WRIT to JOIN ADDITIONAL DEFENDER-OTHERS FED

#### Relief

Respondent is bringing a counter-claim and cross-claim against Petitioner-City of Philadelphia and Cross-Claim Respondent-The Commonwealth of Pennsylvania pursuant to 42 USCS § 1983

The district courts shall have original jurisdiction of any civil action authorized by law to be commenced by any person pursuant to 28 USCS § 1343(a)(1)(2)(3)(4). Respectfully, Respondent request for this matter to be transferred to the United States Court of Appeals for the Third Circuit pursuant to 28 USCS § 1343(a)(1)(2)(3)(4).

Respectfully, Respondent request for this matter to be transferred to the United States District Court for the Eastern District of Pennsylvania due to "CONFLICT of INTEREST".

Respondent is bringing a cross claim against the Commonwealth of Pennsylvania, which employees State Judges at the Common Pleas Court of Philadelphia, Pennsylvania Supreme Court, Superior Court and the Commonwealth Court of Pennsylvania; therefore, this matter should be transferred due to "CONFLICT of INTEREST".

At cases 230T0155 and 230T0156, Respondent has alleged that State Judges, such as Judge Michele D. Hangley and others have engaged in fraudulent activity.

A State Judge overseeing this matter causes a "CONFLICT of INTEREST"; therefore, this matter should be transferred to the United States Court of Appeals for the Third Circuit.

Petitioner Alleges Public Fraud, Judicial Fraud, Corruption, Violations of State Statues, Pennsylvania Constitution, and Pennsylvania Administrative Codes; therefore, is bringing a Civil Action against Petitioner-City of Philadelphia and Cross-Claim Respondent-The Commonwealth of Pennsylvania pursuant to 42 USCS § 1983.

Also, Petitioner Alleges a Fraudulent Creation of New Law, which Exalted the Status of Administrative Rule **210 Pa. Code § 1115(f)** to a Substantive Objection, that Determined Petitioner's Right to Justice, which is a Violation State Statutes and Administrative Rules such as, **Pa. Code § 105(a)** and or **1 Pa. C.S. § 1928(c)**, and or **1 Pa.C.S. § 1921(c)**, and or Pa. R.A.P. 124, and or Pa. R.A.P. 124(b) and or **231 Pa. Code § 126**, and or 1 Pa.C.S. §1922(1),(4),(5), allegedly.

The June 26, 2023, Per Curiam Order for cases 12 EM 2023, 50 ET 2023, 51 ET 2023, and 52 ET 2023, that REJECTED Petitioner's Improvidently filed Petition for Allowance to Appeal, which alleged Judicial Fraud, is a decision by the panel of the PA Supreme Court, that is inconsistent with the decision of a different panel of the same court, on the same subject, regarding missteps in following procedural rules being the ends to an appeal.

The prior panels of the PA Supreme Court have decided that procedural rules are NOT substantive objections; therefore, CANNOT be exalted to the status of a substantive objection, which determines someone's right to justice, and to do so with a Per Curiam Order is a fraudulent *Creation of New Law* and violates Pa. Code § 105(a) and or 1 Pa. C.S. § 1928(c), and or 1 Pa.C.S. § 1921(c), and or Pa. R.A.P. 124, and or Pa. R.A.P. 124(b) and or 231 Pa. Code § 126, and or 1 Pa.C.S. §1922(1),(4),(5), allegedly

United States Court of Appeals for the Third Circuit James A. Byrne U.S. Courthouse 601 Market Street Philadelphia, PA 19106

January 18, 2024

Aisha Bradley 6225 Ellsworth Street Phila., PA 19143 (610)659-7858

#### **VERIFICATION**

I, AISHA BRDLEY, Respondent, verify that the facts set forth in the foregoing are true and correct to the best of my information, knowledge and belief.

I understand that the statements contained herein are subject to the Penalties of 18 Pa C.S.A., Section 4904 relating to unsworn falsification to authorities.

January 18, 2024

Aisha Bradley 6225 Ellsworth Street Phila., PA 19143 (610)659-7858

#### **AFFIDAVIT OF RESPONDENT**

I, Aisha Bradley (**Respondent**), being duly sworn according to law, depose and say that the facts stated herein are true and correct to the best of my knowledge and understanding. In any statements that are incorrect or untrue, is in error and not intentional.

January 18, 2024

Aisha Bradley 6225 Ellsworth Street Phila., PA 19143 (610)659-7858 BRDL3690@GMAIL.COM

#### NOTICE TO PLEAD

Respondent submitted a **Notice of Removal**. You are notified to plead.

Name: Attorney Lauren Burgess Representing: City of Philadelphia ONE PENN CENTER 1617 J.F.K. BLVD, Suite 555 Philadelphia, PA 19103

(215) 790-1117 (phone) (267) 790-1197 (fax) Lauren.Burgess@lgbs.com Attorney Identification No. 322108

Date Served: January 18, 2024 Method of Service: Electronic Filing

Name: Attorney Jake O'Donnell Representing: City of Philadelphia

(215) 790-1117 (phone) NONE (fax) Jake.Odonell@lgbs.com Attorney Identification No. 332005

Date Served: January 18, 2024 Method of Service: Electronic Filing ONE PENN CENTER 1617 J.F.K. BLVD, Suite 555 Philadelphia, PA 19103 Name: Attorney Melissa Simola Suite 100

Representing: Summit Park East 1630 Locust Street General Partnership Philadelphia, PA 19103

and University City Housing Company

(215) 253-7052 (phone) (215) 320-2001 (fax) MSIMOLA@uchweb.com Attorney Identification No. 208903

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed

Name: William B. Shuey 15<sup>th</sup> Floor

Representing: City of Philadelphia 1515 Arch Street

Philadelphia, PA 19102

(215) 683-5440 (phone) (215) 683-5299 (fax) William.Shuey@phila.gov Attorney Identification No. 208792

Date Served: January 18, 2024

Method of Service: Electronic Filing and or emailed

### **Senior Deputy Attorney General Cara Greenhall**

Torts Attorney for the Commonwealth

1600 Arch Street, Ste. 300 Philadelphia, Pennsylvania 19103 215-560-2414

Date Served: January 18, 2024

Method of Service: Electronic Filing-Emailed

### **Solicitor Kristin K. Bray**

Solicitor for the City of Philadelphia 1515 Arch St. 15<sup>th</sup> Floor Philadelphia, Pennsylvania 19102 <u>Kristin.Bray@Phila.gov</u>

Date Served: January 18, 2024

Method of Service: Electronic Filing-Emailed

#### JUDGE PATRICK F. DUGAN

#### **State Employee**

Crossclaim-Respondent and or Defendant
The Justice Juanita Kidd Stout Center for Criminal Justice
1301 Filbert Street,
Suite 1303
Philadelphia, PA 19107
Patrick.Dugan@courts.phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing- Emailed

# JUDGE CRYSTAL BRYANT-POWELL State Employee

Crossclaim-Respondent and or Defendant
The Justice Juanita Kidd Stout Center for Criminal Justice
Suite 1210
1301 Filbert Street
Philadelphia, PA 19107
Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to AG Greenhall

# JUDGE MICHELE D. HANGLEY State Employee

Crossclaim-Respondent and or Defendant
City Hall
Room 229A
1400 JFK. BLVD
Philadelphia, PA 19107

hangley.virtualcourtroom@courts.phila.gov
michele.hangley@courts.phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed

## **ADA JAMES DELLAFIORA**City of Philadelphia Employee

Crossclaim-Respondent and or Defendant
Office of the District Attorney
3 South Penn Square
Philadelphia, PA 19107
Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to AG Greenhall and

Solicitor Bray

#### ATTORNEY TRACY TRIPP

### Former City of Philadelphia Employee

Crossclaim-Respondent and or Defendant Delaware County Public Defender 220 N. JACKSON STREET MEDIA, PENNSYLVANIA 19063 Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall and

Solicitor Bray

#### ATTORNEY AMY KIRBY

### Former City of Philadelphia Employee

Crossclaim-Respondent and or Defendant ATTN: Solicitor Kristin K. Bray 1515 Arch St. 15<sup>th</sup> Floor Philadelphia, Pennsylvania 19102 Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed AG Greenhall and

Solicitor Bray

#### **THOMAS MARRO**

### **City of Philadelphia Employee**

Crossclaim-Respondent and or Defendant

ATTN: Solicitor Kristin K. Bray

1515 Arch St.

15<sup>th</sup> Floor

Philadelphia, Pennsylvania 19102

Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to Solicitor Bray and

AG Greenhall

#### **DARIN GATTI**

### Former City of Philadelphia Employee

Crossclaim-Respondent and or Defendant

ATTN: Solicitor Kristin K. Bray

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15<sup>th</sup> Floor

Philadelphia, Pennsylvania 19102

Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to Solicitor Bray and

AG Greenhall

# ATTORNEY PHOENICIA WALLACE State Employee

Crossclaim-Respondent and or Defendant PA Supreme Court Prothonotary Office City Hall Room 468 1400 JFK. BLVD Philadelphia, PA 19107 PHOENICIA. WALLACE@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed

### ATTORNEY IRENE BIZOSSO

### **Former State Employee**

Crossclaim-Respondent and or Defendant ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300
1600 Arch Street,

Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall

### MICHAEL AMMANN State Employee

Crossclaim-Respondent and or Defendant ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Aisha Bradley's Notice of Removal for case 2130T0202, Page 19 of 42

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall

## SUPERIOR COURT PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the JULY 11, 2022, ORDER at cases 1166 EDA 2022 and 1167 EDA 2022 ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Date Served: January 18, 2024

Emailed to Senior Deputy AG Cara Greenhall

Method of Service: Electronic Filing-emailed to AG Greenhall

## COMMONWEALTH COURT OF PA PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the JAN. 10-23, ORDER at cases 1192 CD 2022, 1193 CD 2022, 1194 CD 2022 ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall

# PA SUPREME COURT PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the June 26-23, ORDER at case 12 EM 2023 ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street,

Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall

# PA SUPREME COURT PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the Aug. 11-23, ORDER at case 43 EM 2023

ATTN: Senior Deputy Attorney General Cara Greenhall

Ste. 300

1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to AG Greenhall

# JUDGE MEGAN SULLIVAN (J-S03006-23/393 EDA 2022) State Employee

Crossclaim-Respondent and or Defendant 530 Walnut St., Suite 315 Philadelphia, PA 19106 MEGAN.SULLIVAN@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed Sullivan and sent to

AG Greenhall

# JUDGE MARY JANE BOWES (J-S03006-23 /393 EDA 2022) State Employee

Crossclaim-Respondent and or Defendant 530 Walnut St., Suite 315 Philadelphia, PA 19106 MARYJANE.BOWES@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed Bowes and sent to

AG Greenhall

# JUDGE DANIEL D. MCCAFFERY (J-S03006-23/393 EDA 2022) State Employee

Crossclaim-Respondent and or Defendant 530 Walnut St., Suite 315 Philadelphia, PA 19106 DANIEL.MCCAFFERY@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to Mccaffery and AG

Greenhall

#### **JUDGE DANIEL ANDERS**

#### **State Employee**

Crossclaim-Respondent and or Defendant City Hall Room 529 1400 JFK. BLVD Philadelphia, PA 19107 DANIEL.ANDERS@courts.phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing E-filed and

or Emailed

### Judge Joshua Roberts State Employee

Crossclaim-Respondent and or Defendant City Hall Room 538 1400 JFK. BLVD Philadelphia, PA 19107 joshua.roberts@courts.phila.gov roberts.virtualcourtroom@courts.phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing E-filed and

or Emailed

## Feige Grundman City of Philadelphia Employee

Crossclaim-Respondent and or Defendant Divisional Deputy City Solicitor- Right to Know Legislation and Legal Counsel Unit City of Philadelphia Law Department 1515 Arch Street 17th Floor Phila. PA 19102 feige.grundman@phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

# Jill Freeman City of Philadelphia Employee

Crossclaim-Respondent and or Defendant City of Philadelphia *Law Department* 1515 Arch Street, 17th Floor Philadelphia, PA 19102 215-683-5457 Jill.Freeman@phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

### Alexandra Desantis City of Philadelphia Employee

Crossclaim-Respondent and or Defendant Office of Inspector General The Curtis Center Room 300 East 601 Walnut Street Philadelphia, PA 19106 ALEXANDER.DESANTIS@phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

Aisha Bradley's Notice of Removal for case 2130T0202, Page 24 of 42

### **Rebecca Rhynhart**

Crossclaim-Respondent and or Defendant ATTN: Solicitor Kristin K. Bray 1515 Arch St.

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Philadelphia, Pennsylvania 19102

Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

Solicitor Bray and AG Greenhall

Joseph Seletyn (J-S03006-23 /393 EDA 2022) State Employee

Crossclaim-Respondent and or Defendant 530 Walnut St., Suite 315 Philadelphia, PA 19106 JOSEPH.SELETYN@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed Seletyn and AG

Greenhall

#### THE COMMONWEALTH OF PENNSYLVANIA

Crossclaim-Respondent and or Defendant ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to AG Greenhall

January 18, 2024

Aisha Bradley 6225 Ellsworth Street Phila. PA 19143

Phila., PA 19143 (610)659-7858

### AVERMENT OF ACCURACY AND COMPLETE REPRESENTATION

I certify that the electronic copy of **RESPONDENT'S** documents is an accurate and complete copy of the paper version.

January 18, 2024

Aisha Bradley 6225 Ellsworth Street Phila., PA 19143 (610)659-7858

## Confidential Information and Confidential Documents. Certification

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

January 18, 2024

Aisha Bradley 6225 Ellsworth Street Phila., PA 19143 (610)659-7858

#### **CERTIFICATE of SERVICE**

I, AISHA BRADLEY, PRO SE, do hereby certify that I have this day served the foregoing documents by electronic service via electronic filing. Once accepted that completes my service. Under Pa. R.C.P. 205.4(g)(2), service will be completed when the filing is accepted by the Prothonotary.

Name: Attorney Lauren Burgess Representing: City of Philadelphia ONE PENN CENTER 1617 J.F.K. BLVD, Suite 555 Philadelphia, PA 19103

(215) 790-1117 (phone) (267) 790-1197 (fax) Lauren.Burgess@lgbs.com Attorney Identification No. 322108

Date Served: January 18, 2024 Method of Service: Electronic Filing

Name: Attorney Jake O'Donnell Representing: City of Philadelphia

(215) 790-1117 (phone) NONE (fax) Jake.Odonell@lgbs.com Attorney Identification No. 332005

Date Served: January 18, 2024 Method of Service: Electronic Filing ONE PENN CENTER 1617 J.F.K. BLVD, Suite 555 Philadelphia, PA 19103 Name: Attorney Melissa Simola Suite 100

Representing: Summit Park East 1630 Locust Street General Partnership Philadelphia, PA 19103

and University City Housing Company

(215) 253-7052 (phone) (215) 320-2001 (fax) MSIMOLA@uchweb.com Attorney Identification No. 208903

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed

Name: William B. Shuey 15<sup>th</sup> Floor

Representing: City of Philadelphia 1515 Arch Street

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Date Served: January 18, 2024

Method of Service: Electronic Filing and or emailed

### **Senior Deputy Attorney General Cara Greenhall**

Torts Attorney for the Commonwealth

1600 Arch Street, Ste. 300 Philadelphia, Pennsylvania 19103 215-560-2414

Date Served: January 18, 2024

Method of Service: Electronic Filing-Emailed

### **Solicitor Kristin K. Bray**

Solicitor for the City of Philadelphia 1515 Arch St. 15<sup>th</sup> Floor Philadelphia, Pennsylvania 19102 <u>Kristin.Bray@Phila.gov</u>

Date Served: January 18, 2024

Method of Service: Electronic Filing-Emailed

#### JUDGE PATRICK F. DUGAN

#### **State Employee**

Crossclaim-Respondent and or Defendant
The Justice Juanita Kidd Stout Center for Criminal Justice
1301 Filbert Street,
Suite 1303
Philadelphia, PA 19107
Patrick.Dugan@courts.phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing- Emailed

# JUDGE CRYSTAL BRYANT-POWELL State Employee

Crossclaim-Respondent and or Defendant
The Justice Juanita Kidd Stout Center for Criminal Justice
Suite 1210
1301 Filbert Street
Philadelphia, PA 19107
Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to AG Greenhall

# JUDGE MICHELE D. HANGLEY State Employee

Crossclaim-Respondent and or Defendant
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Philadelphia, PA 19107
hangley.virtualcourtroom@courts.phila.gov
michele.hangley@courts.phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed

### ADA JAMES DELLAFIORA City of Philadelphia Employee

Crossclaim-Respondent and or Defendant
Office of the District Attorney
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Philadelphia, PA 19107
Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to AG Greenhall and

Solicitor Bray

#### ATTORNEY TRACY TRIPP

### Former City of Philadelphia Employee

Crossclaim-Respondent and or Defendant Delaware County Public Defender 220 N. JACKSON STREET MEDIA, PENNSYLVANIA 19063 Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall and

Solicitor Bray

#### ATTORNEY AMY KIRBY

### Former City of Philadelphia Employee

Crossclaim-Respondent and or Defendant

ATTN: Solicitor Kristin K. Bray

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15<sup>th</sup> Floor

Philadelphia, Pennsylvania 19102

Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed AG Greenhall and

Solicitor Bray

#### THOMAS MARRO

### **City of Philadelphia Employee**

Crossclaim-Respondent and or Defendant

ATTN: Solicitor Kristin K. Bray

1515 Arch St.

15th Floor

Philadelphia, Pennsylvania 19102

Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to Solicitor Bray and

AG Greenhall

#### **DARIN GATTI**

### Former City of Philadelphia Employee

Crossclaim-Respondent and or Defendant ATTN: Solicitor Kristin K. Bray 1515 Arch St. 15th Floor

Philadelphia, Pennsylvania 19102

Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to Solicitor Bray and

AG Greenhall

### ATTORNEY PHOENICIA WALLACE

**State Employee** 

Crossclaim-Respondent and or Defendant PA Supreme Court Prothonotary Office City Hall Room 468 1400 JFK. BLVD Philadelphia, PA 19107 PHOENICIA. WALLACE@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed

# **ATTORNEY IRENE BIZOSSO Former State Employee**

Crossclaim-Respondent and or Defendant ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall

### MICHAEL AMMANN State Employee

Crossclaim-Respondent and or Defendant ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414 Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall

# SUPERIOR COURT PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the JULY 11, 2022, ORDER at cases 1166 EDA 2022 and 1167 EDA 2022 ATTN: Senior Deputy Attorney General Cara Greenhall

Ste. 300

1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

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# COMMONWEALTH COURT OF PA PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the JAN. 10-23, ORDER at cases 1192 CD 2022, 1193 CD 2022, 1194 CD 2022 ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

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### PA SUPREME COURT PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the June 26-23, ORDER at case 12 EM 2023 ATTN: Senior Deputy Attorney General Cara Greenhall

Ste. 300

1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

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Method of Service: Electronic Filing-emailed to AG Greenhall

### PA SUPREME COURT PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the Aug. 11-23, ORDER at case 43 EM 2023

ATTN: Senior Deputy Attorney General Cara Greenhall

Ste. 300

1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

### JUDGE MEGAN SULLIVAN (J-S03006-23/393 EDA 2022) State Employee

Crossclaim-Respondent and or Defendant 530 Walnut St., Suite 315 Philadelphia, PA 19106 MEGAN.SULLIVAN@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed Sullivan and sent to

AG Greenhall

### JUDGE MARY JANE BOWES (J-S03006-23 /393 EDA 2022) State Employee

Crossclaim-Respondent and or Defendant 530 Walnut St., Suite 315 Philadelphia, PA 19106 MARYJANE.BOWES@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed Bowes and sent to

AG Greenhall

## JUDGE DANIEL D. MCCAFFERY (J-S03006-23/393 EDA 2022) State Employee

Crossclaim-Respondent and or Defendant 530 Walnut St., Suite 315 Philadelphia, PA 19106 DANIEL.MCCAFFERY@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to Mccaffery and AG

Greenhall

#### **JUDGE DANIEL ANDERS**

**State Employee** 

Crossclaim-Respondent and or Defendant City Hall Room 529 1400 JFK. BLVD Philadelphia, PA 19107 DANIEL.ANDERS@courts.phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing E-filed and

or Emailed

### Judge Joshua Roberts State Employee

Crossclaim-Respondent and or Defendant City Hall Room 538 1400 JFK. BLVD Philadelphia, PA 19107 joshua.roberts@courts.phila.gov roberts.virtualcourtroom@courts.phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing E-filed and

or Emailed

### Feige Grundman City of Philadelphia Employee

Crossclaim-Respondent and or Defendant
Divisional Deputy City Solicitor- Right to Know
Legislation and Legal Counsel Unit
City of Philadelphia Law Department
1515 Arch Street 17th Floor
Phila. PA 19102
feige.grundman@phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

### Jill Freeman City of Philadelphia Employee

Crossclaim-Respondent and or Defendant City of Philadelphia *Law Department* 1515 Arch Street, 17th Floor Philadelphia, PA 19102 215-683-5457 Jill.Freeman@phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

### Alexandra Desantis City of Philadelphia Employee

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Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

### **Rebecca Rhynhart**

Crossclaim-Respondent and or Defendant ATTN: Solicitor Kristin K. Bray 1515 Arch St.

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Philadelphia, Pennsylvania 19102

Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

Solicitor Bray and AG Greenhall

Joseph Seletyn (J-S03006-23 /393 EDA 2022) State Employee

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Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed Seletyn and AG

Greenhall

#### THE COMMONWEALTH OF PENNSYLVANIA

Crossclaim-Respondent and or Defendant ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300

1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

January 18, 2024

Aisha Bradley 6225 Ellsworth Street Phila., PA 19143 (610)659-7858 BRDL3690@GMAIL.COM

(s) fer f

## United States District Court for the Eastern District of Pennsylvania-CIVIL

#### **REMOVED FROM**

### COMMON PLEAS COURT of PHILADELPHIA COUNTY FIRST JUDICIAL DISTRICT of PENNSYLVANIA TRIAL DIVISION-CIVIL

CITY of PHILADELPHIA Petitioner

V.

**AISHA ASHA BRADLEY** 

Commonwealth of Pennsylvania BCP-23-05-035459 Crossclaim-Respondent and or Defendant

(1) Summit Park East, GP,

Crossclaim-Respondent and or Defendant

(2) University City Housing Co,

Crossclaim-Respondent and or Defendant

October Term, 2023 Docket No: 2310T0202

Property 800 SEFFERT STREET, UNIT A OPA # 214088515 No. T0202

List of Defendants And Attorneys

(3) JUDGE PATRICK F. DUGAN-State Employee

Crossclaim-Respondent and or Defendant

(4) JUDGE MICHELE D. HANGLEY-State Employee

Crossclaim-Respondent and or Defendant

(5) JUDGE CRYSTAL BRYANT-POWELL-State Employee

Crossclaim-Respondent and or Defendant

(6) ADA JAMES DELLAFIORA-City of Philadelphia
Employee

Crossclaim-Respondent and or Defendant

(7) ATTORNEY TRACY TRIPP-Former City of Philadelphia Employee

Crossclaim-Respondent and or Defendant

(8) ATTORNEY AMY KIRBY-Former City of Philadelphia
Employee

Crossclaim-Respondent and or Defendant

(9) THOMAS MARRO-City of Philadelphia Employee
Crossclaim-Respondent and or Defendant

(10) DARIN GATTI-Former City of Philadelphia Employee

Crossclaim-Respondent and or Defendant

(11) ATTORNEY PHOENICIA WALLACE-State Employee

Crossclaim-Respondent and or Defendant

### (12) ATTORNEY IRENE BIZOSSO-Former State Employee

Crossclaim-Respondent and or Defendant

### (13) MICHAEL AMMANN-State Employee

Crossclaim-Respondent and or Defendant

(14) SUPERIOR COURT PER CURIAM-JANE/JOHN DOES for the JULY 11, 2022, ORDER at cases 1166 EDA 2022 and 1167 EDA 2022-State Employees

Crossclaim-Respondent and or Defendant

### (15) COMMONWEALTH COURT OF PA PER CURIAM

JANE/JOHN DOES for the JAN. 10-23, ORDER at cases 1192 CD 2022, 1193 CD 2022, 1194 CD 2022-**State Employees**Crossclaim-Respondent and or Defendant

- (16) PA SUPREME COURT PER CURIAM JANE/JOHN DOES for the June 26-23, ORDER at case 12 EM 2023-State Employees

  Crossclaim-Respondent and or Defendant
- (17) PA SUPREME COURT PER CURIAM JANE/JOHN DOES for the Aug. 11-23, ORDER at case 43 EM 2023-State Employees

  Crossclaim-Respondent and or Defendant

#### (18) JUDGE MEGAN SULLIVAN (J-S03006-23/393 EDA 2022)-

### **State Employee**

Crossclaim-Respondent and or Defendant

(19) JUDGE MARY JANE BOWES (J-S03006-23 /393 EDA 2022) -

### **State Employee**

Crossclaim-Respondent and or Defendant

(20) JUDGE DANIEL D. MCCAFFERY(J-S03006-23/393 EDA 2022)-

#### **State Employee**

Crossclaim-Respondent and or Defendant

### (21) JUDGE DANIEL ANDERS-State Employee

Crossclaim-Respondent and or Defendant

### (22) JUDGE JOSHUA ROBERTS-State Employee

Crossclaim-Respondent and or Defendant

- (23) Feige Grundman-City of Philadelphia Employee Crossclaim-Respondent and or Defendant
- (24) Jill Freeman-City of Philadelphia Employee Crossclaim-Respondent and or Defendant
- (25) Alexandra Desantis-City of Philadelphia Employee Crossclaim-Respondent and or Defendant

### (26) Rebecca Rhynhart-Former City of Philadelphia

**Employee** Crossclaim-Respondent and or Defendant

### (27) PROTHONOTARY JOSEPH SELETYN-State Employee

Crossclaim-Respondent and or Defendant

#### (28) THE COMMONWEALTH OF PENNSYLVANIA

Crossclaim-Respondent and or Defendant

#### **VERIFICATION**

I, AISHA BRDLEY, Respondent, verify that the facts set forth in the foregoing are true and correct to the best of my information, knowledge and belief.

I understand that the statements contained herein are subject to the Penalties of 18 Pa C.S.A., Section 4904 relating to unsworn falsification to authorities.

January 18, 2024

Aisha Bradley 6225 Ellsworth Street Phila., PA 19143 (610)659-7858

#### **AFFIDAVIT OF RESPONDENT**

I, Aisha Bradley (**Respondent**), being duly sworn according to law, depose and say that the facts stated herein are true and correct to the best of my knowledge and understanding. In any statements that are incorrect or untrue, is in error and not intentional.

January 18, 2024

Aisha Bradley 6225 Ellsworth Street Phila., PA 19143 (610)659-7858 BRDL3690@GMAIL.COM

#### NOTICE TO PLEAD

Respondent submitted a **Notice of Removal**. You are notified to plead.

Name: Attorney Lauren Burgess Representing: City of Philadelphia

ONE PENN CENTER 1617 J.F.K. BLVD, Suite 555 Philadelphia, PA 19103

ONE PENN CENTER

1617 J.F.K. BLVD, Suite 555

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(215) 790-1117 (phone) (267) 790-1197 (fax) Lauren.Burgess@lgbs.com Attorney Identification No. 322108

Date Served: January 18, 2024 Method of Service: Electronic Filing

Name: Attorney Jake O'Donnell Representing: City of Philadelphia

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Date Served: January 18, 2024 Method of Service: Electronic Filing

Name: Attorney Melissa Simola Representing: Summit Park East General Partnership and University City Housing Company

Suite 100 1630 Locust Street Philadelphia, PA 19103

(215) 253-7052 (phone) (215) 320-2001 (fax) MSIMOLA@uchweb.com Attorney Identification No. 208903 Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed

Name: William B. Shuey 15<sup>th</sup> Floor

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(215) 683-5440 (phone) (215) 683-5299 (fax) William.Shuey@phila.gov Attorney Identification No. 208792

Date Served: January 18, 2024

Method of Service: Electronic Filing and or emailed

### **Senior Deputy Attorney General Cara Greenhall**

Torts Attorney for the Commonwealth

1600 Arch Street, Ste. 300 Philadelphia, Pennsylvania 19103 215-560-2414

Date Served: January 18, 2024

Method of Service: Electronic Filing-Emailed

### Solicitor Kristin K. Bray

Solicitor for the City of Philadelphia 1515 Arch St. 15<sup>th</sup> Floor Philadelphia, Pennsylvania 19102 <u>Kristin.Bray@Phila.gov</u>

Date Served: January 18, 2024

Method of Service: Electronic Filing-Emailed

### JUDGE PATRICK F. DUGAN State Employee

Crossclaim-Respondent and or Defendant

Aisha Bradley's Notice of Removal for case 2130T0202, Page 9 of 37

The Justice Juanita Kidd Stout Center for Criminal Justice 1301 Filbert Street,
Suite 1303
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Patrick.Dugan@courts.phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing- Emailed

### JUDGE CRYSTAL BRYANT-POWELL State Employee

Crossclaim-Respondent and or Defendant
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Suite 1210
1301 Filbert Street
Philadelphia, PA 19107
Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to AG Greenhall

### JUDGE MICHELE D. HANGLEY State Employee

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Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed

### **ADA JAMES DELLAFIORA**City of Philadelphia Employee

Crossclaim-Respondent and or Defendant

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<a href="mailed-to-senior-beputy-AG-Cara Greenhall">Kristin.Bray@Phila.gov</a>
Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to AG Greenhall and

Solicitor Bray

#### ATTORNEY TRACY TRIPP

**Former City of Philadelphia Employee** 

Crossclaim-Respondent and or Defendant Delaware County Public Defender 220 N. JACKSON STREET MEDIA, PENNSYLVANIA 19063 Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall and

Solicitor Bray

#### ATTORNEY AMY KIRBY

### **Former City of Philadelphia Employee**

Crossclaim-Respondent and or Defendant

ATTN: Solicitor Kristin K. Bray

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Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed AG Greenhall and

Solicitor Bray

#### THOMAS MARRO

### **City of Philadelphia Employee**

Crossclaim-Respondent and or Defendant

ATTN: Solicitor Kristin K. Bray

1515 Arch St.

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Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to Solicitor Bray and

AG Greenhall

#### **DARIN GATTI**

### Former City of Philadelphia Employee

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Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to Solicitor Bray and

AG Greenhall

### **ATTORNEY PHOENICIA WALLACE State Employee**

Crossclaim-Respondent and or Defendant PA Supreme Court Prothonotary Office City Hall Room 468 1400 JFK. BLVD Philadelphia, PA 19107 PHOENICIA. WALLACE@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed

### **ATTORNEY IRENE BIZOSSO Former State Employee**

Crossclaim-Respondent and or Defendant ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103

215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall

### MICHAEL AMMANN State Employee

Crossclaim-Respondent and or Defendant ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

### SUPERIOR COURT PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the JULY 11, 2022, ORDER at cases 1166 EDA 2022 and 1167 EDA 2022

ATTN: Senior Deputy Attorney General Cara Greenhall

Ste. 300

1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall

### COMMONWEALTH COURT OF PA PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the JAN. 10-23, ORDER at cases 1192 CD 2022, 1193 CD 2022, 1194 CD 2022 ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

### PA SUPREME COURT PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the June 26-23, ORDER at case 12 EM 2023 ATTN: Senior Deputy Attorney General Cara Greenhall

Ste. 300

1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall

### PA SUPREME COURT PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the Aug. 11-23, ORDER at case 43 EM 2023

ATTN: Senior Deputy Attorney General Cara Greenhall

Ste. 300

1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

### JUDGE MEGAN SULLIVAN (J-S03006-23/393 EDA 2022) State Employee

Crossclaim-Respondent and or Defendant 530 Walnut St., Suite 315 Philadelphia, PA 19106 MEGAN.SULLIVAN@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed Sullivan and sent to

AG Greenhall

### JUDGE MARY JANE BOWES (J-S03006-23 /393 EDA 2022) State Employee

Crossclaim-Respondent and or Defendant 530 Walnut St., Suite 315 Philadelphia, PA 19106 MARYJANE.BOWES@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed Bowes and sent to

AG Greenhall

## JUDGE DANIEL D. MCCAFFERY (J-S03006-23/393 EDA 2022) State Employee

Crossclaim-Respondent and or Defendant 530 Walnut St., Suite 315 Philadelphia, PA 19106 DANIEL.MCCAFFERY@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to Mccaffery and AG

Greenhall

#### **JUDGE DANIEL ANDERS**

#### **State Employee**

Crossclaim-Respondent and or Defendant City Hall Room 529 1400 JFK. BLVD Philadelphia, PA 19107 DANIEL.ANDERS@courts.phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing E-filed and

or Emailed

### Judge Joshua Roberts State Employee

Crossclaim-Respondent and or Defendant City Hall Room 538 1400 JFK. BLVD Philadelphia, PA 19107 joshua.roberts@courts.phila.gov roberts.virtualcourtroom@courts.phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing E-filed and

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### Feige Grundman City of Philadelphia Employee

Crossclaim-Respondent and or Defendant
Divisional Deputy City Solicitor- Right to Know
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1515 Arch Street 17th Floor
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Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

### Jill Freeman City of Philadelphia Employee

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Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

### Alexandra Desantis City of Philadelphia Employee

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Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

Aisha Bradley's Notice of Removal for case 2130T0202, Page 19 of 37

### **Rebecca Rhynhart**

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Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

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Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed Seletyn and AG

Greenhall

#### THE COMMONWEALTH OF PENNSYLVANIA

Crossclaim-Respondent and or Defendant

ATTN: Senior Deputy Attorney General Cara Greenhall

Ste. 300

1600 Arch Street,

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215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

January 18, 2024

Aisha Bradley 6225 Ellsworth Street Phila., PA 19143 (610)659-7858

### AVERMENT OF ACCURACY AND COMPLETE REPRESENTATION

I certify that the electronic copy of **RESPONDENT'S** documents is an accurate and complete copy of the paper version.

January 18, 2024

Aisha Bradley 6225 Ellsworth Street Phila., PA 19143 (610)659-7858

### Confidential Information and Confidential Documents. Certification

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

January 18, 2024

Aisha Bradley 6225 Ellsworth Street Phila., PA 19143 (610)659-7858

#### **CERTIFICATE of SERVICE**

I, AISHA BRADLEY, PRO SE, do hereby certify that I have this day served the foregoing documents by electronic service via electronic filing. Once accepted that completes my service. Under Pa. R.C.P. 205.4(g)(2), service will be completed when the filing is accepted by the Prothonotary.

Name: Attorney Lauren Burgess Representing: City of Philadelphia ONE PENN CENTER 1617 J.F.K. BLVD, Suite 555 Philadelphia, PA 19103

(215) 790-1117 (phone) (267) 790-1197 (fax) Lauren.Burgess@lgbs.com Attorney Identification No. 322108

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Name: Attorney Jake O'Donnell Representing: City of Philadelphia

(215) 790-1117 (phone) NONE (fax) Jake.Odonell@lgbs.com Attorney Identification No. 332005

Date Served: January 18, 2024 Method of Service: Electronic Filing ONE PENN CENTER 1617 J.F.K. BLVD, Suite 555 Philadelphia, PA 19103 Name: Attorney Melissa Simola Suite 100

Representing: Summit Park East 1630 Locust Street General Partnership Philadelphia, PA 19103

and University City Housing Company

(215) 253-7052 (phone) (215) 320-2001 (fax) MSIMOLA@uchweb.com Attorney Identification No. 208903

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed

Name: William B. Shuey 15<sup>th</sup> Floor

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Date Served: January 18, 2024

Method of Service: Electronic Filing and or emailed

### **Senior Deputy Attorney General Cara Greenhall**

Torts Attorney for the Commonwealth

1600 Arch Street, Ste. 300 Philadelphia, Pennsylvania 19103 215-560-2414

Date Served: January 18, 2024

Method of Service: Electronic Filing-Emailed

#### **Solicitor Kristin K. Bray**

Solicitor for the City of Philadelphia 1515 Arch St. 15<sup>th</sup> Floor Philadelphia, Pennsylvania 19102 <u>Kristin.Bray@Phila.gov</u>

Date Served: January 18, 2024

Method of Service: Electronic Filing-Emailed

#### JUDGE PATRICK F. DUGAN

### **State Employee**

Crossclaim-Respondent and or Defendant
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Date Served: January 18, 2024

Method of Service: Electronic Filing- Emailed

### JUDGE CRYSTAL BRYANT-POWELL State Employee

Crossclaim-Respondent and or Defendant
The Justice Juanita Kidd Stout Center for Criminal Justice
Suite 1210
1301 Filbert Street
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Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

### JUDGE MICHELE D. HANGLEY State Employee

Crossclaim-Respondent and or Defendant
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Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed

### **ADA JAMES DELLAFIORA**City of Philadelphia Employee

Crossclaim-Respondent and or Defendant Office of the District Attorney 3 South Penn Square Philadelphia, PA 19107 Kristin.Bray@Phila.gov Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024 Method of Service: Electronic Filing- emailed to AG Greenhall and

Solicitor Bray

#### ATTORNEY TRACY TRIPP

### **Former City of Philadelphia Employee**

Crossclaim-Respondent and or Defendant Delaware County Public Defender 220 N. JACKSON STREET MEDIA, PENNSYLVANIA 19063 Kristin.Bray@Phila.gov

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall and

Solicitor Bray

#### ATTORNEY AMY KIRBY

### **Former City of Philadelphia Employee**

Crossclaim-Respondent and or Defendant

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Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed AG Greenhall and

Solicitor Bray

#### **THOMAS MARRO**

### **City of Philadelphia Employee**

Crossclaim-Respondent and or Defendant

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Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to Solicitor Bray and

AG Greenhall

#### **DARIN GATTI**

### Former City of Philadelphia Employee

Crossclaim-Respondent and or Defendant

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Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to Solicitor Bray and

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### ATTORNEY PHOENICIA WALLACE State Employee

Crossclaim-Respondent and or Defendant PA Supreme Court Prothonotary Office City Hall Room 468 1400 JFK. BLVD Philadelphia, PA 19107 PHOENICIA. WALLACE@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed

### **ATTORNEY IRENE BIZOSSO Former State Employee**

Crossclaim-Respondent and or Defendant ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

### MICHAEL AMMANN State Employee

Crossclaim-Respondent and or Defendant ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall

### SUPERIOR COURT PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the JULY 11, 2022, ORDER at cases 1166 EDA 2022 and 1167 EDA 2022 ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

### COMMONWEALTH COURT OF PA PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the JAN. 10-23, ORDER at cases 1192 CD 2022, 1193 CD 2022, 1194 CD 2022 ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to AG Greenhall

### PA SUPREME COURT PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the June 26-23, ORDER at case 12 EM 2023 ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Date Served: January 18, 2024

Emailed to Senior Deputy AG Cara Greenhall

### PA SUPREME COURT PER CURIAM State Employees

Crossclaim-Respondent and or Defendant JANE/JOHN DOES for the Aug. 11-23, ORDER at case 43 EM 2023

ATTN: Senior Deputy Attorney General Cara Greenhall

Ste. 300

1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414

Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to AG Greenhall

### JUDGE MEGAN SULLIVAN (J-S03006-23/393 EDA 2022) State Employee

Crossclaim-Respondent and or Defendant 530 Walnut St., Suite 315 Philadelphia, PA 19106 MEGAN.SULLIVAN@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed Sullivan and sent to

AG Greenhall

### JUDGE MARY JANE BOWES (J-S03006-23 /393 EDA 2022) State Employee

Crossclaim-Respondent and or Defendant 530 Walnut St., Suite 315 Philadelphia, PA 19106 MARYJANE.BOWES@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed Bowes and sent to

AG Greenhall

### JUDGE DANIEL D. MCCAFFERY (J-S03006-23/393 EDA 2022) State Employee

Crossclaim-Respondent and or Defendant 530 Walnut St., Suite 315 Philadelphia, PA 19106 DANIEL.MCCAFFERY@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed to Mccaffery and AG

Greenhall

#### **JUDGE DANIEL ANDERS**

### **State Employee**

Crossclaim-Respondent and or Defendant City Hall Room 529 1400 JFK. BLVD Philadelphia, PA 19107 DANIEL.ANDERS@courts.phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing E-filed and

or Emailed

### Judge Joshua Roberts State Employee

Crossclaim-Respondent and or Defendant
City Hall
Room 538
1400 JFK. BLVD
Philadelphia, PA 19107
joshua.roberts@courts.phila.gov
roberts.virtualcourtroom@courts.phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing E-filed and

or Emailed

### Feige Grundman City of Philadelphia Employee

Crossclaim-Respondent and or Defendant Divisional Deputy City Solicitor- Right to Know Legislation and Legal Counsel Unit City of Philadelphia Law Department 1515 Arch Street 17th Floor Phila. PA 19102 feige.grundman@phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

### Jill Freeman City of Philadelphia Employee

Crossclaim-Respondent and or Defendant City of Philadelphia *Law Department* 1515 Arch Street, 17th Floor Philadelphia, PA 19102 215-683-5457 Jill.Freeman@phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

Aisha Bradley's Notice of Removal for case 2130T0202, Page 35 of 37

### Alexandra Desantis City of Philadelphia Employee

Crossclaim-Respondent and or Defendant
Office of Inspector General
The Curtis Center
Room 300 East
601 Walnut Street
Philadelphia, PA 19106
ALEXANDER.DESANTIS@phila.gov

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

### **Rebecca Rhynhart**

Crossclaim-Respondent and or Defendant ATTN: Solicitor Kristin K. Bray 1515 Arch St. 15<sup>th</sup> Floor Philadelphia, Pennsylvania 19102 Kristin.Bray@Phila.gov
Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing: Electronic Filing-Emailed

Solicitor Bray and AG Greenhall

### Joseph Seletyn (J-S03006-23 /393 EDA 2022) State Employee

Crossclaim-Respondent and or Defendant 530 Walnut St., Suite 315 Philadelphia, PA 19106 JOSEPH.SELETYN@pacourts.us

Date Served: January 18, 2024

Method of Service: Electronic Filing-emailed Seletyn and AG

Greenhall

Aisha Bradley's Notice of Removal for case 2130T0202, Page 36 of 37

#### THE COMMONWEALTH OF PENNSYLVANIA

Crossclaim-Respondent and or Defendant ATTN: Senior Deputy Attorney General Cara Greenhall Ste. 300 1600 Arch Street, Philadelphia, Pennsylvania 19103 215-560-2414 Emailed to Senior Deputy AG Cara Greenhall

Date Served: January 18, 2024

Method of Service: Electronic Filing- emailed to AG Greenhall

January 18, 2024

Aisha Bradley 6225 Ellsworth Street Phila., PA 19143 (610)659-7858

### JS 44 (Rev. 04/21) LIST OF DEPENDENT FOR ENTIRE SHELLED 01/18/24 Page 80 of 81

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS	DEFENDANTS	PLEAS	E SEE ATTACHEME	NT FOR ENTIRE					
CITY OF PHILADELPHIA				AISHA BRADLEY, CROSS-CLAIM DEFENDANT COMMONWEALTH OF PA,CROSS-CLAIM SUMMIT PARK					
<b>(b)</b> County of Residence of		County of Residence of First Listed Defendant PHILADELPHIA							
(b) County of Residence of First Listed Plaintiff PHILADELPHIA  (EXCEPT IN U.S. PLAINTIFF CASES)				(IN U.S. PLAINTIFF CASES ONLY)  NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.					
(c) Attorneys (Firm Name, A	Address, and Telephone Numbe	or)		Attorneys (If Known)					
	ESS, JAKE O'DON		YED.						
	R & SAMPSON, LLF	AISHA BRADLEY IS PRO SE, AND EMAIL DOCS TO AG CARA GREENHALL, MELISSA SIMOLA, KIRSTEN BRAY							
II. BASIS OF JURISD	f ICTION (Place an "X" in	One Box Only)		FIZENSHIP OF P					
X 1 U.S. Government Plaintiff	3 Federal Question (U.S. Government	3 Federal Question (U.S. Government Not a Party)				Incorporated <i>or</i> Pri of Business In T		PTF  4	DEF 4
2 U.S. Government Defendant	4 Diversity (Indicate Citizensh	ip of Parties in Item III)	Citize	n of Another State	2 2	Incorporated and Proof Business In A		5	<u></u> 5
				n or Subject of a eign Country		Foreign Nation		<u> </u>	<u>6</u>
IV. NATURE OF SUIT		nly) DRTS	FO	RFEITURE/PENALTY		for: Nature of S KRUPTCY		scription STATUTI	
110 Insurance	PERSONAL INJURY	PERSONAL INJURY		5 Drug Related Seizure		eal 28 USC 158	375 False C		213
120 Marine 130 Miller Act 140 Negotiable Instrument	310 Airplane 315 Airplane Product Liability	365 Personal Injury - Product Liability 367 Health Care/		of Property 21 USC 881 0 Other	<b>—</b> ···		376 Qui Tam (31 USC 3729(a)) 400 State Reapportionment		
150 Recovery of Overpayment	320 Assault, Libel &	Pharmaceutical			PROPE	RTY RIGHTS	410 Antitrus		mem
& Enforcement of Judgment	Slander 330 Federal Employers'	Personal Injury Product Liability			820 Copy 830 Pater		430 Banks a 450 Comme		g
152 Recovery of Defaulted	Liability	368 Asbestos Personal				nt - Abbreviated	460 Deporta	ation	
Student Loans (Excludes Veterans)	340 Marine 345 Marine Product	Injury Product Liability			New 840 Trade	Drug Application emark	470 Rackete Corrupt	eer influen Organizat	
153 Recovery of Overpayment of Veteran's Benefits	Liability 350 Motor Vehicle	PERSONAL PROPERT		LABOR  0 Fair Labor Standards	880 Defe	nd Trade Secrets	480 Consun		1(02)
160 Stockholders' Suits	355 Motor Vehicle	371 Truth in Lending	H''	Act	Act o	of 2016	485 Telepho	C 1681 or one Consur	
190 Other Contract	Product Liability	380 Other Personal	72	0 Labor/Management		L SECURITY	<b>-</b>	tion Act	
195 Contract Product Liability 196 Franchise	360 Other Personal Injury	Property Damage 385 Property Damage	⊢ <sub>74</sub>	Relations 0 Railway Labor Act	861 HIA 862 Blac	(1395ff) k Lung (923)	490 Cable/S 850 Securit		odities/
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REAL PROPERTY	Medical Malpractice CIVIL RIGHTS	PRISONER PETITION	<b>NS</b> 79	Leave Act  O Other Labor Litigation	864 SSIL 865 RSI	Title XVI (405(g))	890 Other S 891 Agricul	-	
210 Land Condemnation	440 Other Civil Rights	Habeas Corpus:	79	1 Employee Retirement			893 Enviror	nmental Ma	atters
220 Foreclosure 230 Rent Lease & Ejectment	441 Voting 442 Employment	463 Alien Detainee 510 Motions to Vacate		Income Security Act		L TAX SUITS s (U.S. Plaintiff	895 Freedor	n of Inform	nation
240 Torts to Land	443 Housing/	Sentence Sentence			or D	efendant)	896 Arbitra	tion	
245 Tort Product Liability	Accommodations	530 General		IMMICDATION		Third Party USC 7609	899 Admini		
290 All Other Real Property	445 Amer. w/Disabilities - Employment	535 Death Penalty Other:	146	IMMIGRATION  2 Naturalization Application	_	JSC 7609		view or Ap  Decision	pear or
	446 Amer. w/Disabilities -	- 🔲 540 Mandamus & Othe		5 Other Immigration			950 Constit	utionality	of
	Other 448 Education	550 Civil Rights 555 Prison Condition		Actions			State St	atutes	
	Γ	560 Civil Detainee -							
		Conditions of Confinement							
V. ORIGIN (Place an "X" is		•			-		•		
		Remanded from Appellate Court	]4 Reins Reop		erred from er District	6 Multidistrio Litigation - Transfer		Multidist Litigation Direct Fi	n -
VI. CAUSE OF ACTION	18 USCS 8 1961(1)(B)	atute under which you ar ı, 18 Pa. C.S. § 4911, 18 I					(4)(d)(1)(2)(3)(f	·)(1)(2)(3)	(4)(5)(6)
vii chest of heric	Brief description of ca	ause: mpering with Public Reco	rd or Infor	mation, 18 Pa. C.S. § 510	01-Obstruction	to The Administra	ation of Law.Co	urt Retalia	ation
VII. REQUESTED IN		IS A CLASS ACTION		EMAND \$		HECK YES only i			
COMPLAINT:	UNDER RULE 2			0,000,000.00	Л	JRY DEMAND:	<b>X</b> Yes	□No	
VIII. RELATED CASI IF ANY	E(S) (See instructions):	JUDGE GENE E.K	(, PRATTI	ER	DOCKE	ET NUMBER 2:2	:3-cv-05044 24	cv-15 ar	nd 24-c <del></del>
DATE		SIGNATURE OF ATT			DOCKL		5. 555 77, 27	J. 15 un	
Jan 18, 2024		/s/ AISHA BRADLEY	OKNET C	T RECORD					
FOR OFFICE USE ONLY									
RECEIPT # AM	MOUNT	APPLYING IFP		JUDGE		MAG. JUD	)GE		

### Case 2:24-cv-00269-GEKP Document 2 Filed 01/18/24 Page 81 of 81 UNITED STATES DISTRICT COURT

# FOR THE EASTERN DISTRICT OF PENNSYLVANIA PLEASE SEE ATTACHEMENT FOR ENTIRE LIST OF DEFENDANTS (to be used by counsel to indicate the category of the case for the purpose of assignment to the appropriate calendar)

NOTE: A trial de novo will be a jury only if there has been compliance with F.R.C.P. 38.

Address of Plaintiff: C/O LINEBARGER GO	OGGAN BLAIR & SAMPSON LLP, 160	00 JFK BLVD, SUITE 910, PHILA	DELPHIA PA 19103
			PHILA. 19103
<ol> <li>Does this case involve the same and Pending or within one year previous.</li> <li>Does this case involve the validity Numbered case pending or within the same individual?</li> </ol>	s answered to any of the following cluded in an earlier numbered suit his court? FACTS ARE SLIGHTLY assue of fact or grow out of the same ously terminated action in this corry or infringement of a patent alread on one year previously terminated to habeas corpus, social security and the same of	g questions: DO NOT CONSOL SLIGHTLY DIFFER pending or within one year DIFFERENT PURSUANT TO 53 ne transaction as a prior suit art?  addy in suit or any earlier action of this court?  opeal, or pro se case filed	Yes
I certify that, to my knowledge, the within action in this court except as note above.	HA BRADLEY	any now pending or within or PRO SE	e year previously terminated
JANUARY 18-24	orney-at-Law (Must sign above)	<del></del>	I.D. # (if applicable)
1. Indemnity Contract, Marine Co 2. FELA 3. Jones Act-Personal Injury 4. Antitrust 5. Wage and Hour Class Action/C 6. Patent 7. Copyright/Trademark 8. Employment 9. Labor-Management Relations 10. Civil Rights 11. Habeas Corpus 12. Securities Cases 13. Social Security Review Cases 14. Qui Tam Cases  15. All Other Federal Question Cas	ollective Action		iury nal Injury y (Please specify): Cases: (Please specify)
I, AISHA BRADLEY, co	ARBITRATION CERTIFICATION OF THE CONTROL OF THE CON	see from eligibility for arbitration) hereby certify: JURY knowledge and belief, the damage	DEMANDED ges recoverable in this civil action
DATE: JANUARY 18-24	/s/ AISHA BRAD	FN	O SE
	Attorney-at-Law (Sign here if a	pplicable) A	ttorney ID # (if applicable)